

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
EASTERN DIVISION**

<b>RICHARD E. MARTI,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>INTERSTATE POWER AND LIGHT and ALLIANT ENERGY CORPORATE SERVICES, INC.</b>  <b>Defendants.</b>	<b>Case No. 2:15-cv-01016-LRR</b>  <b>NOTICE OF REMOVAL</b>
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Defendants Interstate Power and Light (“IPL”) and Alliant Energy Corporate Services, Inc. (“AECS”), for their Notice of Removal of this action from the Iowa District Court in and for Allamakee County to the United States District Court for the Northern District of Iowa, Eastern Division pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, state as follows:

1. Plaintiff Richard E. Marti (“Marti”) filed a Petition naming the IPL and AECS as Defendants in the Iowa District Court in and for Allamakee County on May 12, 2015, Case No. LACV026107 (the “State Case”).

2. On or about May 12, 2015, copies of the Original Notice and Petition in the State Case were sent to Defendants IPL and AECS. Copies of the Original Notice and Petition, which constitute all the pleadings and process filed in the State Case to date, are attached hereto as Exhibit A.

3. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is timely filed within 30 days after the receipt by Defendants of a copy of the initial pleading which sets forth the removable claim.

4. The claims in the Petition relate to Marti's employment with IPL, and allege claims of employment discrimination pursuant to the Americans With Disabilities Act (42 U.S.C., § 12100 *et seq.*) and state law.

5. Paragraph 25 of the Petition states: "This is a civil action seeking judgment, relief and/or damages brought pursuant to the Americans with Disabilities Act, 42 U.S.C. § 12101 *et seq.* as amended for discrimination based upon a disability and the failure to accommodate same."

6. Removal to this Court is therefore appropriate pursuant to 28 U.S.C. §§ 1331, 1441, and 1446.

7. This Court is the United States District Court for the district and division embracing the place where the State Case is currently pending.

8. Written notice of the filing of this Notice of Removal has been provided to all parties who have appeared in the State Case and a copy of this Notice of Removal has been filed with the Clerk of Court of Iowa District Court in and for Allamakee County.

**WHEREFORE**, Defendants IPL and AECS respectfully request that this action, now pending in the Iowa District Court in and for Allamakee County, be removed to the United States District Court for the Northern District of Iowa, Eastern Division.

Respectfully Submitted,

/s/ Bridget R. Penick  
Bridget R. Penick AT0006147  
Brant M. Leonard AT0010157

FREDRIKSON & BYRON, P.A.  
309 East 5<sup>th</sup> Street, Suite 202A  
Des Moines, Iowa 50309  
(515) 243-0071  
(612) 492-7078 (fax)  
bpenick@fredlaw.com  
bleonard@fredlaw.com  
ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 18, 2015, the above and foregoing instrument was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties of record.

/s/ Sarah Austin